IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

`	In re:) Chapter 11
Debtor. ')	RED RIVER TALC, LLC Debtor. ¹) Case No. 24-90505 (CML)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code"), Choate, Hall & Stewart LLP hereby enters appearance as counsel for Liberty Mutual Insurance Company and its affiliates ("Liberty"). The undersigned respectfully requests that all notices given or required to be given in this proceeding and all papers served or required to be served in this proceeding, be served upon the following:

CHOATE, HALL & STEWART LLP

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PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service is not only for the notices and other documents referred to in the Rules specified above but includes, without limitation, all orders, notices, applications, motions, petitions, schedules of assets and liabilities, statements of financial affairs, pleadings, requests, complaints or demands, whether

¹ The last four digits of the Debtor's taxpayer identification number are 8508. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, email or otherwise.

PLEASE TAKE FURTHER NOTICE that Liberty does not intend that this Notice of Appearance and Request for Service or any later appearance, pleading, proof of claim, claim or suit be deemed or construed to be a waiver of (1) the right to have final orders entered only after *de novo* review by the U.S. District Court for the Southern District of Texas (the "District Court"), (2) the right to trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to these cases, (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Liberty expressly reserves.

Dated: January 24, 2025 Respectfully submitted,

CHOATE, HALL & STEWART LLP

/s/Jacob S. Lang

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Counsel to Liberty Mutual Insurance Company and its Affiliates

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2025, the forgoing document was served through the Court's CM/ECF System on all parties registered to receive such service.

/s/R. J. Shannon

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